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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

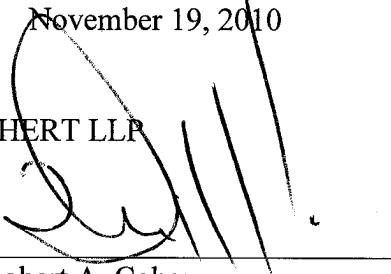
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NML CAPITAL, LTD. : 03 Civ. 8845 (TPG)
Plaintiff, : 05 Civ. 2434 (TPG)
v. : 06 Civ. 6466 (TPG)
REPUBLIC OF ARGENTINA, : 07 Civ. 1910 (TPG)
Defendant. : 07 Civ. 2690 (TPG)
: 07 Civ. 6563 (TPG)
: 08 Civ. 2541 (TPG)
: 08 Civ. 3302 (TPG)
: 08 Civ. 6978 (TPG)
: 09 Civ. 1707 (TPG)
: 09 Civ. 1708 (TPG)

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EM LTD., :
Plaintiff, :
v. : 03 Civ. 2507 (TPG)
THE REPUBLIC OF ARGENTINA, :
Defendant. :
-----X

NOTICE OF CROSS-MOTION TO COMPEL

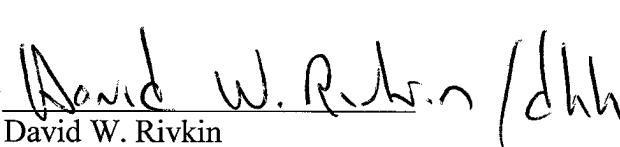
PLEASE TAKE NOTICE THAT, upon the Memorandum of Law in Opposition to Motion to Quash Subpoena Served on Nonparty Jaime Caruana and in Support of Motion to Compel, dated November 19, 2010, and the accompanying Declarations of Alex Cukierman Ph.D., Saverio Lembo, and Dennis Hranitzky, and all prior pleadings and proceedings in these actions, plaintiffs NML Capital, Ltd. and EM Ltd. will move this Court, before the Honorable Thomas P. Griesa, at Courtroom 26B of the United States Courthouse, 500 Pearl Street, New York, NY 10007, on a date to be determined by the Court, for an Order pursuant to Rules 30, 45 and 69 of the Federal Rules of Civil Procedure to compel nonparty Jaime Caruana to comply with the subpoena served on October 7, 2010, and granting such other and further relief as the Court deems appropriate.

Dated: New York, New York
November 19, 2010

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